

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20005

In the Matter of)	
)	
Provisioning of Directory Listing Information)	CC Docket No. 92-105
Under the Telecommunications Act of 1934, As)	
Amended)	CC Docket No. 99-273
)	
The Use of N11 Codes and Other Abbreviated)	
Dialing Arrangements)	
_____)	

**COMMENTS REGARDING THE USE
OF 211 AND DIRECTORY PRE-SUBSCRIPTION**

COME NOW Cellular Directory Information, Inc. (“CDI”) with these Comments Regarding the use of 211 and Directory Pre-Subscription (the “Comments”), filed before the Federal Communications Commission (the “Commission” or the “FCC”), in docket numbers 99-273 and 92-105.

On or about March 4, 2002, CDI filed a Petition for Reconsideration before the Commission in docket 92-105. Said Petition requested the Commission reallocate the abbreviated dialing arrangement, 211, to Cellular Directory Information, Inc. for the purposes of a wireless directory services. The Commission is yet to address the issues presented in CDI’s Petition, or redress the use of 211.

There is little debate over the technical issues surrounding the implementation of Directory Assistance (“DA”) pre-subscription services as proposed by Telegate AG. Such alternative dialing arrangements, or software necessary to allow a consumer to pre-subscribe to a particular DA provided would be both costly and difficult. Additionally,

there are significant concerns as to consumer benefit and welfare by providing new dialing arrangements or pre-subscription services. Many telephone companies even contend that the added confusion would outweigh the benefits of competition.

CDI agrees with the concerns voiced by the Carriers, and others, about the implementation of pre-subscription services and consumer benefit. Nevertheless, CDI is diabolically opposed to permitting the telephone carriers to maintain a monopoly on the DA services.

CDI requests that the Commission consider allocating 211 to Cellular Directory Information, Telegate AG, or other such company, for the purpose of competitive DA services. Having 211 as a competitive service creates a non-binary service; that is, the consumer is at all times free to choose either 211 or 411. Such choice would greatly improve DA services and market competition.

WHEREFORE, the above stated reasons, Cellular Directory Information, Inc. hereby requests the Commission note these Comments, and allocate 211 for competitive DA services. CDI is willing to present testimony before the FCC as to the consumer benefit of 211 & 411 being used for DA services.

Respectfully submitted this 3rd day of April, 2002

/S/ ERIC JAMES GLAZIER

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